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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91191056
Party	Plaintiff White Rock Distilleries, Inc.
Correspondence Address	DANIEL I SCHLOSS GREENBERG TRAURIG LLP 200 PARK AVENUE, 34TH FLOOR NEW YORK, NY 10166 UNITED STATES schlossd@gtlaw.com
Submission	Rebuttal Brief
Filer's Name	Masahiro Noda
Filer's e-mail	schlossd@gtlaw.com, nodam@gtlaw.com
Signature	/MASAHIRO NODA/
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

IN THE MATTER OF APPLICATION

Mark: PINNACLES RANCHES
Applicant: Franciscan Vineyards, Inc.
Serial No.: 77/598,674
Published in
the **Official Gazette**: March 17, 2009

WHITE ROCK DISTILLERIES, INC.)	
)	
Opposer,)	
)	
v.)	Opposition No. 91191056
)	
FRANCISCAN VINEYARDS, INC.,)	
)	
Applicant.)	
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REPLY BRIEF FOR OPPOSER WHITE ROCK DISTILLERIES, INC.

Daniel I. Schloss
Alan N. Sutin
Masahiro Noda
GREENBERG TRAURIG, LLP
200 Park Avenue, 34th Floor
New York, New York 10166
Tel: (212) 801-9200
Fax: (212) 801-6400

Attorneys for Opposer White Rock Distilleries, Inc.

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I. PRELIMINARY STATEMENT

The evidence of record in this proceeding demonstrates clearly that the term “Pinnacles Ranches” as used by Applicant Franciscan Vineyards, Inc. (“Applicant”) identifies a real geographic place and that consumers are likely to make (and have been consistently encouraged by Applicant to make) a goods/place association. Faced with overwhelming evidence supporting these inescapable conclusions, Applicant in its untimely¹ and disjointed trial brief attempts to divert attention from the obvious by throwing various arguments at the proverbial wall in the hope that one will stick. It is notable that none of Applicant’s arguments dispute that “Pinnacles Ranches” identifies a geographic place. On the issue of the existence of a goods/place association, Applicant is largely silent, except that Applicant’s own citations to testimony of record confirm that the term “Pinnacles Ranches” is viewed by the very people who designed and executed the marketing and advertising of Applicant’s wines as a “sub-brand” within Applicant’s ESTANCIA brand identifying the place where Applicant’s grapes were grown. In an astonishing near-concession, Applicant elected to end its trial brief as though it were an ex parte Office Action response, making an argument “in the alternative” and essentially inviting the Board to amend its application without the consent of White Rock by finding acquired distinctiveness – a claim never before asserted by Applicant, and wholly unsupported by the evidence of record.

¹ Applicant’s trial brief was filed late, as discussed in further detail below.

II. ARGUMENT

A. Applicant Failed To Timely File Its Trial Brief

Pursuant to 37 C.F.R. § 2.128(a)(1), Applicant's trial brief was due on July 18, 2011.² While Applicant dated its brief July 18, 2011 and purported to serve the brief on White Rock on the same date, the very first page of Applicant's TTABVUE submission (Docket Entry No. 63) indicates both in the filing date assigned by the ESTTA system and in the signature block that the brief was actually not filed until July 19, 2011. Applicant also ignored the requirement under 37 C.F.R. § 2.128(b) to include an alphabetic index of cited cases. *See also* TBMP § 801.03.

Accordingly, White Rock respectfully submits that Applicant's trial brief should be given no consideration because it is untimely. In the event that the Board in its discretion nevertheless considers Applicant's late-filed trial brief, White Rock respectfully requests that the Board also consider the following points offered in reply.

B. Applicant's Claim That The Term "Pinnacles Ranches" Has Become Distinctive Lacks Evidentiary Support

Seemingly out of nowhere and in the very last section of its trial brief, Applicant has made a half-hearted, eleventh-hour claim that the term "Pinnacles Ranches" has acquired distinctiveness. Specifically, Applicant states "to the extent that [the] Board rules that Applicant's 'Pinnacles Ranches' mark is primarily geographically descriptive, it has in any event become distinctive as a trademark for its wines." *See* Applicant's Trial Brief at 24. At no time during the more than two-year pendency of this proceeding has Applicant ever before advanced such a claim.

² In this case, trial brief for Opposer White Rock Distilleries, Inc. ("White Rock") was due June 17, 2011 – sixty days from the date set for the close of rebuttal testimony – and Applicant's brief was due thirty days from June 17, 2011, which would have been July 17, 2011. Since July 17, 2011 was a Sunday, Applicant's deadline was the next business day, Monday, July 18, 2011. *See* 37 C.F.R. § 2.197.

In any event, a claim of acquired distinctiveness at this late date would be an impermissible amendment to the application without the consent of White Rock. *See* 37 C.F.R. § 2.133(a) (“An application subject to an opposition may not be amended in substance . . . except with the consent of the other party or parties and the approval of the Trademark Trial and Appeal Board, or upon motion granted by the Board”). Further, the substance of such a claim is devoid of merit.

Applicant bears the burden of proving acquired distinctiveness. *Yamaha Int’l Corp. v. Hoshino Gakki Co.*, 840 F.2d 1572, 6 U.S.P.Q.2d 1001, 1006 (Fed. Cir. 1988); *In re Hollywood Brands, Inc.*, 214 F.2d 139, 102 U.S.P.Q. 294, 295 (C.C.P.A. 1954) (“[T]here is no doubt that Congress intended that the burden of proof [under Section 2(f)] should rest upon the applicant”). Faced with a record devoid of any evidence that would support a claim of acquired distinctiveness, Applicant now attempts to equate its use of the term “Pinnacles,” which is not at issue in this proceeding³ with use of the different term “Pinnacles Ranches.” Specifically, Applicant points to: (1) four wine bottle “neckers” – two of which do not even show the term “Pinnacles Ranches”; (2) wholesale sales and marketing expenditures from 2004 to 2010 devoid of any marketplace or industry context; (3) a paltry number of press mentions of “Pinnacles” and “Pinnacles Ranches” wine; and (4) its alleged trademark policing efforts with respect to “Pinnacles.” *See* Applicant’s Trial Brief at 21-24.

Applicant’s evidence is minimal and clearly insufficient to show that the term “Pinnacles Ranches” has acquired distinctiveness. Of the four wine bottle neckers, two do not even display

³ The parties are also engaged in a related pending case, Opposition No. 91185984, in which the evidence overwhelmingly shows that the term “Pinnacles” is used by Franciscan Vineyards, Inc. (which is the Opposer in Opposition No. 91185984) in an extremely “low-profile” manner that creates virtually no marketplace identity.

the term “Pinnacles Ranches” at all, while the other two do not display the term in a manner likely to be recognized by consumers as a trademark.⁴

Applicant’s sales and advertising numbers are notably devoid of any marketplace context that could plausibly support a finding of acquired distinctiveness. Multiple witnesses for Applicant testified that Applicant only maintains revenue and advertising spending data at the “brand level” – *i.e.*, for Applicant’s umbrella ESTANCIA brand of wine, which includes sub-brands such as “Pinnacles Ranches.”⁵ Lilienthal Dep. at 45:10-19; Black Dep. at 9:8-20. Since Applicant does not maintain separate sales figures nor calculate advertising expenditures at the sub-brand level, Applicant had to extrapolate the cited data from its primary ESTANCIA brand to wines that fell under the alleged “Pinnacles Ranches” sub-brand. *See id.*; *see also* Black Dep. at 14:12-15:15. There is no testimony or evidence in the record as to whether Applicant’s sales and advertising numbers are large or small vis-à-vis other comparable wines and whether such figures are so substantial as to warrant an inference of extensive consumer awareness. Further, because there is no context as to market share, the sales figures have little probative value in determining the strength or distinctiveness of Applicant’s mark. *See e.g., Frederick Wildman & Sons, Ltd. v. Frederick William Scherrer*, 2010 WL 4036049, at *3 (T.T.A.B. 2010).

The lack of recognition and renown of the term “Pinnacles Ranches” is substantiated by the fact that Applicant could only muster three articles or press mentions that specifically

⁴ Based on the placement of the term “Pinnacles Ranches” and the context of its use – among several other terms describing features of the goods – prospective purchasers would view this word as part of the text listing the features of the product. In examining the architecture of the labels, which is similar to the neckers, the messaging intended to be conveyed by the labels is that the brand name is ESTANCIA, that the wine originates in the Monterey growing area and is made from pinot noir / chardonnay/ sauvignon blanc grapes of the specific vintage year in vineyards known as “Pinnacles Ranches.” *See* Reidl Dep. at 28:19-29:11, 38:7-14, 40:6-13. As used by Applicant, and as likely perceived by purchasers and prospective purchasers, the term “Pinnacles Ranches” merely informs the potential purchaser of an aspect of the goods, namely, communicating that “Pinnacles Ranches” was the place at which the grapes used in Applicant’s wine were grown. *See* Reidl Dep. at 34:15-35:22.

⁵ Applicant’s current and former employees have uniformly testified that the term “Pinnacles Ranches” is a “sub-brand” subordinate to the ESTANCIA brand. *See e.g.*, Lilienthal Dep. at 9:14-20, 22:7-11; Mora Dep. at 31:18-32:4.

mention “Pinnacles Ranches.”⁶ Further, **none** of the few proffered press clippings identifies a “Pinnacles Ranches” branded wine; the term “Pinnacles Ranches” is always preceded by or identified in conjunction with Applicant’s ESTANCIA mark. *Id.* Three ancillary media mentions over a period spanning more than seven years cannot be viewed as even approaching anything close to sufficient evidence of acquired distinctiveness. Finally, Applicant’s tangential discussion of its purported trademark policing efforts⁷ are wholly irrelevant, as such efforts have no bearing on the issues in this proceeding.

In view of the foregoing, the record falls significantly short of establishing that the term “Pinnacles Ranches” has acquired distinctiveness.

C. Applicant’s Arguments in its Trial Brief Cannot Withstand Scrutiny Because They Distort the Evidence of Record

While there is an abundance of evidence in the record supporting White Rock’s position that the term “Pinnacles Ranches” is primarily geographically descriptive and fails to function as a trademark, Applicant in its trial brief attempts to divert attention from its lack of evidentiary support by distorting what minimal evidence exists.

(1) Applicant Conveniently Combines Facts For “Pinnacles” and “Pinnacles Ranches”

Although the instant proceeding and Opposition No. 91185984 were not consolidated (at Applicant’s insistence), Applicant nonetheless conveniently seeks to import carefully selected facts pertaining to its use of the term “Pinnacles” (as distinct from “Pinnacles Ranches”) wherever convenient. *See* Applicant’s Trial Brief at 4-6. For example, in support of its

⁶ Of the total of seventeen media mentions listed by Applicant, only three mention “Pinnacles Ranches” at all. Applicant’s Trial Brief at 22.

⁷ As explained at length in White Rock’s Trial Brief in Opposition No. 91185984, virtually all of Franciscan’s policing efforts occurred only after Franciscan’s General Counsel was shown and asked to explain multiple examples of third-party uses of “Pinnacle” and “Pinnacles” for wines during his discovery deposition in Opposition No. 91185984.

contention that “Pinnacles Ranches” is “conspicuously placed on and in association with Applicant’s chardonnay, pinot noir and sauvignon wines,” Applicant has inserted an excerpt from Ms. Lilienthal’s testimony where she is discussing how the **“Pinnacles” mark – not “Pinnacles Ranches”**– is used and/or appears on Applicant’s wine bottles. *See* Applicant’s Trial Brief at 5.

(2) **Registration of Applicant’s Mark KEYES CANYON RANCHES is Irrelevant**

Applicant proposes a nonsensical syllogism, positing that because it uses “Pinnacles Ranches” in a similar fashion to the term “Keyes Canyon Ranches,” which term is the subject of another registration not at issue in this case, “Pinnacles Ranches” must therefore also be a trademark. *See* Applicant’s Trial Brief at 5, note 1. However, this argument is facially absurd and is in any event irrelevant to the issues at hand in this proceeding.

(3) **Alleged Sales Figures and Accolades for “Pinnacles Ranches” Is Overstated**

Applicant again seeks to “mix and match” evidence of sales and press mentions by dramatically overstating the “enviable success” of “Pinnacles Ranches” and combining sales figures and press mentions for all ESTANCIA wines that displayed either “Pinnacles” or “Pinnacles Ranches” on them in any manner over a ten-year period. *See* Applicant’s Trial Brief at 6. The evidentiary problem with this approach is that **Applicant did not even begin using the term “Pinnacles Ranches” until May 2004**. *See* Applicant’s Trial Brief at 5. As such, any sales figures going back any further than May 2004 obviously cannot be attributed to the appearance of the term “Pinnacles Ranches.” Further, there is no evidence that since 2004 the term “Pinnacles Ranches” has made any commercial impression at all on the purchasing public, especially since, as noted above, Applicant could manage to scrape together just three press

mentions of “Pinnacles Ranches,” an amount that would obviously not qualify as “numerous”.
See Applicant’s Trial Brief at 6.

D. Nothing In The Record Contravenes The Inescapable Conclusion That “Pinnacle Ranches” is Primarily Geographically Descriptive

The inescapable reality based on the evidentiary record in this proceeding is that, despite Applicant’s attempts to distort the facts, there simply are no facts, testimony, or evidence that support Applicant’s contention that the term “Pinnacles Ranches” as used by Applicant is not primarily geographically descriptive or functions as a trademark.

The evidence in the record is full of testimony and documents that corroborate Applicant’s attempts to ensure that consumers, distributors, and the trade are specifically aware of the geographic location of Pinnacles Ranches as part of its efforts to create a “sense of place” and a “vineyard-to-bottle” story, thus explicitly encouraging a goods/place association between the term “Pinnacles Ranches” and the geographic place of origin of certain of Applicant’s ESTANCIA-brand wines. *See e.g.*, Lilienthal Dep. at 67:20-24, 76:4-6, 88:3-18; Mora Dep. at 20:7-10.

Applicant in its trial brief attempts to obfuscate with the following inaccurate description of White Rock’s position: “Opposer’s primary argument appears to be that because ‘Pinnacles Ranches’ is a name given by Applicant to certain of its own vineyards, and because the vineyards have a specific geographic location (as do all vineyards) the term ‘Pinnacles Ranches’ is primarily geographically descriptive pursuant to 15 U.S.C. §1052(e)(2).” Applicant’s Trial Brief at 10. The fact that “Pinnacles Ranches” is a real, specific geographic location where the grapes for Applicant’s ESTANCIA wines are grown is only half the story. As detailed in White Rock’s Trial Brief, the record in this case is replete with evidence that the primary significance of

“Pinnacles Ranches” is geographic and that Applicant actively encourages the purchasing public to make a goods/place association.

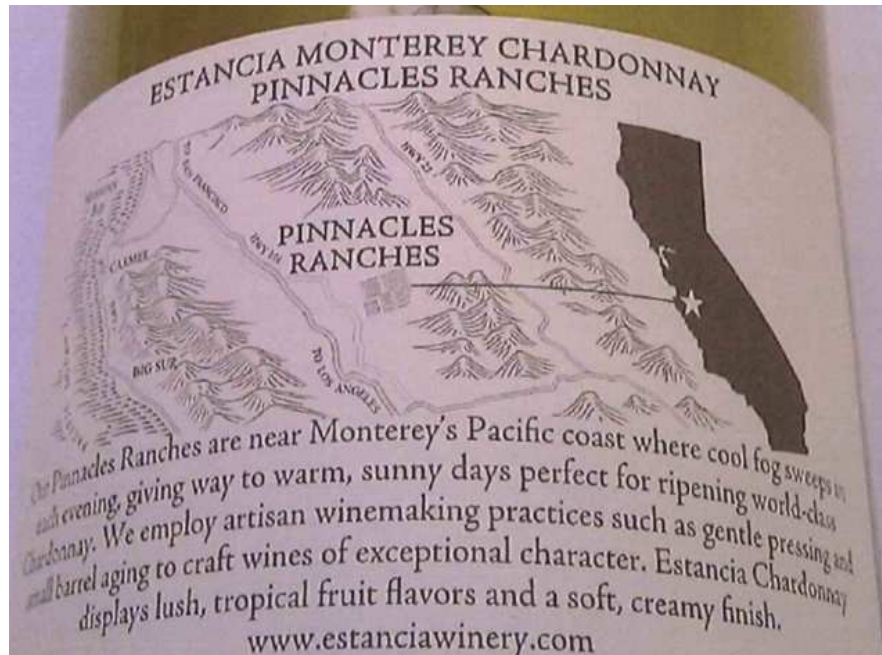
Applicant strains credulity in asserting that the “Pinnacles Ranches” is a “coined trademark” for its vineyards and wines. This statement is not supported by any evidence or testimony in this proceeding – on the contrary, it is repeatedly contradicted by both documentary evidence and the testimony of multiple witnesses, as set forth at length in White Rock’s Trial Brief.

Applicant has also argued that White Rock “has not submitted valid, bona fide . . . evidence to support its claims” that the term “Pinnacles Ranches” is primarily geographically descriptive. This is simply false. The uncontroverted evidence of record – even from the testimony of several of Applicant’s current and former employees – clearly establishes that the term “Pinnacles Ranches” identifies the physical locations of Applicant’s winery and vineyards, and further that Applicant consistently provides this factual information to the public and the trade, thus creating an inevitable goods/place association. White Rock has undoubtedly satisfied the criteria for finding a term to be primarily geographically descriptive and unregistrable, namely, that (1) the primary significance of the proposed mark is that of the name of a place generally known to the public; and (2) that the public would make a goods/place or services/place association, *i.e.*, would believe that the relevant goods or services originate from the geographic location identified by the term proposed to be registered. *See In re JT Tobacconists*, 59 U.S.P.Q.2d 1080, 1081-82 (T.T.A.B. 2001) (citing *Univ. Book Store v. Univ. of Wis. Bd. of Regents*, 33 U.S.P.Q.2d 1385, 1402 (T.T.A.B. 1994)); *In re Cal. Pizza Kitchen Inc.*, 10 U.S.P.Q.2d 1704, 1705 (T.T.A.B. 1988); *In re Societe Generale des Eaux Minerales de Vittel S.A.*, 824 F.2d 957, 3 U.S.P.Q.2d 1450, 1452 (Fed. Cir. 1987).

(1) The Overwhelming Amount of Proof Demonstrating
The Geographic Location of “Pinnacles Ranches” Is Undeniable

The evidence in this case establishes conclusively that “Pinnacles Ranches” refers to a specific geographic area where the grapes for Applicant’s ESTANCIA-branded chardonnay and pinot noir varietals are grown and made into wine. Nothing in the record contradicts this conclusion in any way.

Throughout its trial brief, Applicant makes half-hearted arguments to divert attention from the uncontroverted evidence of record. Applicant spuriously asserts that “Opposer attempts to create a nexus between Applicant’s vineyard and other locations such as Pinnacles National Monument. Opposer relies almost entirely for its empirical proof on various Internet Materials.” Applicant’s Trial Brief at 14. In fact, as set forth in its trial brief, the location of Applicant’s winery and vineyards is clearly identified by Applicant itself, including on Applicant’s own wine labels and marketing materials, as well as through the testimony of Applicant’s current and former employees. *See* White Rock’s Trial Brief at 11-12. For example, as shown below, the back label of Applicant’s ESTANCIA-brand wine includes the following language: “Our Pinnacles Ranches are near Monterey’s Pacific coast where cool fog sweeps in each evening, giving way to warm, sunny days perfect for ripening world-class Chardonnay.” *See id.*; *see also* Lilienthal Dep. at 50:3-5 (stating that on the back label of the wine bottle, “Pinnacles Ranches” appears “as a locator showing where it is in conjunction to California and there is a illustrated map showing it”); Lilienthal Dep. at 86:7-10 (acknowledging the map on the back label shows the location of Pinnacles Ranches and stated that Pinnacles Ranches are near Monterey’s Pacific Coast); *see* Lilienthal Dep. Ex. X.



See Guggino Dep. Ex. 3. Applicant takes issue with White Rock's submission of printed publications from online sources, but such documents are but one of many items of evidence supporting White Rock's position and, these documents in any event substantiate the geographic descriptiveness of the term "Pinnacles Ranches".⁸

Further, Applicant has conceded that (1) "Pinnacles Ranches" is the name of its vineyard where the grapes for Applicant's wine are grown;⁹ and (2) Applicant itself has over the years made efforts to communicate the geographical significance of the terms Pinnacles Ranches¹⁰ as the location where the grapes for Applicant's wines are grown and thus created a goods/place association between Applicant's ESTANCIA-branded chardonnays, pinot noirs and sauvignon blanc and their geographic place of origin at Pinnacles Ranches. Applicant cannot now take the inconsistent position that "Pinnacles Ranches" is obscure in light of the evidence of Applicant's

⁸ Applicant's attempt to explain away the existence of Pinnacles National Monument, Pinnacles Ranches Airport, and Pinnacles High School, and Pinnacles Highway (all located near Applicant's winery) by arguing that Applicant does not use words such as "monument," "national," "airport," or "high school" on its wines is obviously (and almost laughably) irrelevant. The evidence of the existence of such "Pinnacles" locations in and around Applicant's "Pinnacles Ranches" proves the entire area is generally known to the public as "Pinnacles."

⁹ See Applicant's Trial Brief at 4, 9.

¹⁰ See White Rock's Trial Brief at 13-18; see also Lilienthal Dep. at 83:8-18, 87:22-88:1, 88:3-18, 90:22-91:13, 92:2-8; Lilienthal Dep. Ex. V, W, Y, Z, AA, BB, CC; Mora Dep. Ex. H, I.

own efforts to create an association between the location of the winery and its wines among its consumer base. Accordingly, White Rock has established, without doubt, that the primary significance of Pinnacles Ranches to the purchasing public is a real location, namely, the geographic location of origin of Applicant's wine.

(2) Applicant's Claim That "Pinnacles Ranches" Creates A Commercial Impression That Is Not Geographic Is Unsupported By Evidence In The Record

Applicant has argued that the term "Pinnacles Ranches" has varied meanings and commercial impression which would make the primary meaning of such term to be non-geographic. However, the evidence in the record all point to the conclusion that the connotation and any commercial impression conveyed by the term PINNACLES is inevitably tied to the geographic location from which the grapes for the ESTANCIA wine come from. In fact, Applicant's advertising, marketing, promotional efforts to the trade and consumers are all geared to convey such commercial impression and connotation.

Applicant has attempted to set forth the notion that the commercial impression and/or connotation of the term "Pinnacles Ranches" is "the top" or "the peak" through obviously-coached testimony of certain witnesses, none of which are corroborated by any documentary evidence of record. *See* Lilienthal Dep. at 66:24-67:16; Mora Dep. at 17:5-8; *see also* Applicant's Trial Brief at 17-18. There is not a single document of record – advertising and promotional materials, sell sheets, wine labels, presentations to the trade, etc. – that ever mentions or suggests anything about the term "Pinnacles Ranches" signifying the "top" or the "peak." On the contrary, numerous documents of record, including testimony excerpts identified by Applicant in its trial brief, detail both the geographic meanings of the term "Pinnacles Ranches" and Applicant's attempts to communicate and reinforce the geographical significance of the term "Pinnacles Ranches" as the geographic area where the grapes for Applicant's wines

are grown. *See* Reidl Dep. at 104:20-105:20;¹¹ *see e.g.*, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Therefore, contrary to Applicant’s assertion that the meaning and commercial impression conveyed by “Pinnacles Ranches” are varied, there is undoubtedly a single commercial impression for “Pinnacles Ranches” – the geographic place of origin from which the grapes for the ESTANCIA wine come.

¹¹ “Paul Masson Winery is unlikely to have stumbled on the term Pinnacle as the name of a vineyard that was on the base of a Pinnacles National Monument without some association between Pinnacle and Pinnacles. In any event, the label history clearly shows that Franciscan used the mark as Pinnacles when they did use it. And, in fact, the logical reason to do that was because of the national monument.” Reidl Dep. at 105:8-20.

Based on the foregoing, as each required element for geographic descriptiveness has clearly been met in this case, the inevitable conclusion is that the term “Pinnacles Ranches” is primarily geographically descriptive and as such, registration of this term should be refused.

E. “Pinnacles Ranches” Cannot Be Registered Because It Fails To Function As A Mark

There is no evidence in the record pointing to the fact that the public perceives the term “Pinnacles Ranches” as a source indicator for wine. The sole reason Applicant provides in arguing that the term “Pinnacles Ranches” functions as a trademark is that “Applicant uses and displays its trademark in all manners customary to the trade.” Applicant’s Trial Brief at 20. However, Applicant appears to believe that the mere appearance of the term “Pinnacles Ranches” on its wine labels constitutes trademark use, *i.e.*, use in a manner likely to be perceived by consumers as having any trademark significance. In fact, Applicant uses the term “Pinnacles Ranches” in an ancillary, purely informational manner that identifies the geographic origin of Applicant’s goods.¹² As used by Applicant, and as likely perceived by purchasers and prospective purchasers, the term “Pinnacles Ranches” merely informs the potential purchaser of an aspect of the goods, namely, communicating that “Pinnacles Ranches” were the vineyards at which the grapes used in Applicant’s wine were grown. *See* Reidl Dep. at 34:15-35:22. As noted above, there is nothing in the record that contravenes the facts that the term “Pinnacles Ranches” describes the geographic area in which Applicant’s winery and vineyards are located.

Accordingly, the term “Pinnacles Ranches” should be refused registration pursuant to Sections 1, 2, and 45 of the Trademark Act, 15 U.S.C. §§1051, 1052 and 1127, on the grounds

¹² The critical question in determining whether matter sought to be registered is a trademark is whether the asserted mark would be perceived as identifying a single source for the goods. *See In re Brass-Craft Mfg. Co.*, 49 U.S.P.Q.2d 1849, 1852 (T.T.A.B. 1998); *In re Volvo Cars of N. Am. Inc.*, 46 U.S.P.Q.2d 1455, 1459 (T.T.A.B. 1998). The mere fact that a designation appears on use specimens does not make it a trademark. *In re Safariland Hunting Corp.*, 24 U.S.P.Q.2d 1380, 1381 (T.T.A.B. 1992).

that the term fails to function as a trademark because the term "Pinnacles Ranches," as used by Applicant, is informational in nature.

III. CONCLUSION

For the reasons set forth above, White Rock respectfully requests that the Board sustain the Opposition and refuse registration of Application Serial No. 77/598,674.

Respectfully submitted,



Dated: August 1, 2011

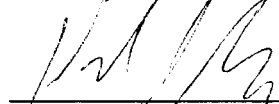
Daniel I. Schloss
Alan N. Sutin
Masahiro Noda
GREENBERG TRAURIG, LLP
200 Park Avenue, 34th Floor
New York, New York 10166
Tel: (212) 801-9200
Fax: (212) 801-6400

CERTIFICATE OF SERVICE

Date: August 1, 2011

The undersigned hereby certifies that a true and correct copy of the foregoing Reply Brief For Opposer, White Rock Distilleries, Inc. has been served by first class mail, postage prepaid, this 1st day of August 2011 upon Franciscan Vineyards, Inc. at the following correspondence address of its counsel of record:

John M. Rannells, Esq.
Baker & Rannells, PA
575 Route 28, Suite 102
Raritan, NJ 08869



Daniel I. Schloss